EXHIBIT G

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Page 1
 1
          IN THE UNITED STATES DISTRICT COURT FOR THE
 2
                  NORTHERN DISTRICT OF OKLAHOMA
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 4
     W. A. DREW EDMONDSON, in his )
 5
     capacity as ATTORNEY GENERAL )
     OF THE STATE OF OKLAHOMA and )
     OKLAHOMA SECRETARY OF THE
 6
     ENVIRONMENT C. MILES TOLBERT,)
 7
     in his capacity as the
     TRUSTEE FOR NATURAL RESOURCES)
 8
     FOR THE STATE OF OKLAHOMA,
 9
                 Plaintiff,
                                   )4:05-CV-00329-TCK-SAJ
10
     vs.
     TYSON FOODS, INC., et al,
11
                 Defendants.
12
13
14
                       THE VIDEOTAPED DEPOSITION OF
     DAVID CHAPMAN, produced as a witness on behalf of
15
16
     the Defendants in the above styled and numbered
     cause, taken on the 6th day of April, 2009, in the
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18
     City of Tulsa, County of Tulsa, State of Oklahoma,
     before me, Lisa A. Steinmeyer, a Certified Shorthand
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20
     Reporter, duly certified under and by virtue of the
     laws of the State of Oklahoma.
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DAVID CHAPMAN, 4-6-09

·		Page 145
1	we present part of the scenario to respondents that	
2	say there's a way to fix this problem and we use	
3	this as a measure of people's willingness to pay to	
4	not have the problem there, and this describes	
5	removing that problem, and so unfortunately the	02:16PM
6	recommended or correct way to do this would be to	
7	ask people's willingness to accept the injury they	
8	had to endure, but that's not possible. We didn't	
9	do that, and so we have to develop a scenario that	
10	asks people what's their willingness to pay to undo	02:17PM
11	a problem that they have been forced to endure, and	
12	so this describes the undoing of the problem.	
13	Q And do you know if the problem can be undone	
14	by adding alum, by doing these alum treatments that	
15	you've described to the respondents?	02:17PM
16	A Me personally do I know?	
17	Q Yes.	
18	A I do not know personally.	
19	Q Did the team reach a conclusion about whether	
20	or not the alum treatments would return the water to	02:17PM
21	the clarity that's described in your survey?	
22	A No. We reached a conclusion that presenting	
23	this information to the respondents at this time in	
24	the survey helped us measure what we were trying to	
25	measure, which is the individual's willingness to	02:18PM

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:		Page 146
1	pay to undo the problem.	. .
2	Q If the problem couldn't be undone, would that	
3	affect your survey results?	
4	A I don't think so, but I'd have to think some	
5	more about that, but as I sit here today, I don't	02:18PM
6	think so.	
7	Q So even if it was simply false, that adding	
8	alum, doing these alum treatments strike that.	
9	Even if doing this alum program that you've	
10	described wouldn't return the water to the clarity)2:19PM
11	levels of 1960, it wouldn't make any difference to	
12	the outcome of your survey?	
13	MS. XIDIS: Objection to form.	
14	A There were multiple questions in there. I'm	
15	trying to figure out which ones to answer.)2:19PM
16	Please	
17	(Whereupon, the court reporter read	
18	back the previous question.)	
19	A What matters is what the respondents	
20	understood. What matters is what the respondents	2:19PM
21	understood and did the respondents understand that	
22	the water clarity could be returned. If the	
23	respondents, which we think we did a very good job	in the second se
24	in describing the situation, describing a fix and	11/2/10/20
25	understanding how they reacted to that fix, as long 0	2:20PM
		4.3

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1	as the respondents took this as being a plausible	Ū
2	scenario to return the water clarity back to the	
3	conditions they cared about, then whether or not it	
4	was actually a program that could be actually	
5	implemented in this time frame wouldn't change those	02:20PM
6	results.	
7	Q So if I understood you correctly, you're	
8	telling me that there does not need to be a factual	
9	basis for undoing the harm?	
10	A There needs to be a plausible basis to the	02:20PM
11	respondents. It's only a mechanism by which we tell	
12	the respondents we can return the environment to the	
13	condition it should be in, and it's only that as a	
14	mechanism. So whether or not that mechanism	
15	actually exists at that time is not the key issue.	02:21PM
16	Q You used the word plausible basis to the	
17	respondents. My question was, does there need to be	
18	a factual basis for undoing the harm?	
19	A Again, this is all about how the respondents	
20	respond to the information we present them, and this	02:21PM
21	discussion here on this part here is about whether	
22	or not the respondents understood the information we	
23	provided to them and found the fact that there was	
24	actually some solution in their minds that they	
25	could get the cleaned-up environment, and that's	02:21PM